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Via Facsimile & Electronic Filing

September 9, 2008

Honorable Michael A. Shipp
United States Magistrate Judge
M.L. King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Walsh Securities, Inc. v. Cristo Property Management, Ltd., et al.
Civil Action No.: 97-3496 (DRD/MAS)

Dear Judge Shipp:

This firm represents Plaintiff Walsh Securities, Inc. ("Walsh Securities") in the above-referenced matter. Pursuant to Your Honor's March 17, 2008 Scheduling Order, a Case Management Conference is presently scheduled for September 16, 2008 and pre-Conference submissions are due to the Court today. As there are several motions currently pending which will affect the course and nature of the remaining discovery in this case, we respectfully request that the Case Management Conference be adjourned until the Court renders decisions on these motions.

Specifically, on June 27, 2008, Walsh Securities filed a motion for leave to file a Fourth Amended Complaint, as well as a separate motion for default judgment against certain defendants who failed to answer its Third Amended Complaint. Shortly thereafter, on July 2, 2008, Defendant Commonwealth Land Title Insurance Company ("Commonwealth") filed an application seeking leave to depose Walsh Securities for up to four (4) days. Clearly, the Court's decisions on these pending motions will have significant impact on the manner in which the remaining discovery is conducted. For example, should the Court allow Walsh Securities to amend its pleading, the parties will necessarily alter their deposition strategies to address the new claims and defenses in the litigation.

We believe that the adjournment this Case Management Conference will conserve the resources of the both the Court and the litigants. Accordingly, we respectfully request that the September 16, 2008 Case Management Conference be adjourned until the Court renders decisions on the pending motions. Please note that defendants Commonwealth, Coastal Title Agency, Nations Title Insurance Company Of New York, Inc., and Fidelity National Title Insurance Company join in this request.

Thank you for Your Honor's kind attention to this matter.

Respectfully submitted,


Robert A. Magnanini

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cc: All Counsel of Record (*via electronic filing only*)
Richard Calanni, *pro se* (*via regular mail*)
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